

---

**From:** Phil Jossi [mailto:PJossi@riverdalebank.com]

**Sent:** Thursday, October 08, 2009 9:15 AM

**To:** Assessments

**Subject:** FIL-58-2009 Comments

I am President of a \$50 million asset based agricultural bank in rural Nebraska. While not happy about it, I can be supportive of a 3 year pre-paid premium; however, the method of determining the base is grossly unfair to small agricultural banks. The problem is taking a snapshot of a day for purposes of determining the base. We are in harvest and local elevators may bring in deposits of \$3-\$5 million and more for grain shipped upstream with the funds gone on to cooperatives with a few days. That swing in deposits on the day you have determined is the snapshot day (9/30/09), then requires the small institution to not only pre-pay a 3 year premium on deposits that will only be in the bank for a week. Not only that, they will be inflated at 5%. Inflating a deposit that no longer exists.

Please reconsider this and in the alternative, look at the average of 3 or 4 past call report dates, readily accessible data, for the purpose of this base. This is likely not a big issue for large institutions but for under \$100 million asset based institutions, it make a difference.

Thanks you for your consideration.

Respectfully submitted.

*Phil Jossi*

Phil Jossi  
President  
State Bank of Riverdale  
P.O. Box 7  
Riverdale, NE 68870  
308-893-2351 Office  
308-440-5143 Cell  
308-893-3600 Fax  
800-360-9035